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December 22, 1998

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Re: CC DOCKET 96-45, FEDERAL-STATE JOINT BOARD ON UNIVERSAL
SERVICE, DA 98-2410

Dear Ms. Salas:

Enclosed in an Original and seven copies of the Comments of the Arkansas Public Service Commission, Kansas Corporation Commission, Maine Public Utilities Commission, Montana Public Service Commission, New Hampshire Public Utilities Commission, New Mexico Public Utility Commission, Vermont Public Service Board and the West Virginia Public Service Commission in the above docket. Please date stamp one copy and return in the enclosed self-addressed stamped envelope.

Sincerely,


Joel Shifman

JS/jaf
Enclosure

cc: International Transcription Service
Sheryl Todd

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

| | | |
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| In the Matter of |) | |
| |) | CC Docket No. 96-45 |
| Federal-State Joint Board on |) | |
| Universal Service |) | DA 98-2410 |
| |) | |

Comments of the

Arkansas Public Service Commission
Kansas Corporation Commission
Maine Public Utilities Commission
Montana Public Service Commission
New Hampshire Public Utilities Commission
New Mexico Public Utility Commission
Vermont Public Service Board
West Virginia Public Service Commission

On November 25, 1998, the Common Carrier Bureau released a request on Second Recommended Decision of Federal-State Joint Board on Universal Service Adopted November 23, 1998. The comments of the Arkansas Public Service Commission, Kansas Corporation Commission, Maine Public Utilities Commission, Montana Public Service Commission, New Hampshire Public Utilities Commission, New Mexico Public Utility Commission, Vermont Public Service Board and the West Virginia Public Service Commission regarding that proposal are attached.

Respectfully submitted,



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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

| | | |
|------------------------------|---|---------------------|
| In the Matter of |) | |
| Federal-State Joint Board on |) | CC Docket No. 96-45 |
| Universal Service |) | and DA 98-2410 |

**COMMENTS ON THE JOINT BOARD'S SECOND RECOMMENDED DECISION
OF THE ARKANSAS, KANSAS, MAINE, MONTANA, NEW HAMPSHIRE,
NEW MEXICO, VERMONT AND WEST VIRGINIA STATE
REGULATORY AGENCIES**

I. INTRODUCTION

The Arkansas, Kansas, Maine, Montana, New Hampshire, New Mexico, Vermont and West Virginia state utility commissions (the "Rural States") appreciate this opportunity to comment on the Second Recommended Decision (the "Recommended Decision") of the Federal- State Joint Board on Universal Service (Joint Board). The Joint Board's Recommended Decision addresses many of the concerns previously expressed by the Rural States which are of particular importance to telecommunications providers operating in these states and to their customers.

The Recommended Decision appropriately focuses on the statutory requirement for reasonable comparability of rates. The Joint Board's recommendation to replace the 25/75 jurisdictional division of responsibility for high cost with another methodology for non-rural carriers significantly addresses concerns raised by states with high cost areas and low population density and is a major step toward ensuring reasonably comparable and affordable rates. In that regard, the Joint Board has further recognized the inequities that were present in the initial proposal and recommended that the Federal Communications Commission (Commission) consider a particular state's ability to support high cost areas within its borders. The Joint Board is to be

commended for its efforts to balance difficult competing interests, a balancing which is clearly evident in the Recommended Decision.

The Joint Board's Recommended Decision also recognizes that additional federal high cost support to non-rural carriers may be necessary to achieve reasonably comparable rates between urban and rural areas within a state and among states nationwide. The Rural States support this conclusion and the Joint Board's further conclusion that the federal support mechanism should not be contingent upon nor require a state to establish an intrastate universal service fund. The Rural States further applaud the Joint Board's recommendations to the Commission regarding the provision of accurate and complete information in consumer bills by all telecommunications carriers about recovery of their universal service contributions.

The Rural States respectfully submit the following comments on particular recommendations that, in our view, fall short of achieving the objectives of the Act.

II. THE APPROPRIATE SIZE OF THE FEDERAL HIGH COST FUND CANNOT BE DETERMINED UNTIL A COST MODEL IS FINALIZED AND A STANDARD IS DEFINED FOR "REASONABLY COMPARABLE" RATES.

The Recommended Decision includes several comments about fund size. Some of the more general comments fairly reflect the difficulty inherent in designing a federal support system. For example, paragraph 3 of the Recommended Decision notes the importance of supporting high cost areas so that consumers in those areas have affordable and reasonably comparable rates, while at the same time avoiding a system that, by its sheer size, does not over-burden consumers across the nation. These are legitimate policy considerations.

However, the Recommended Decision also has several more detailed statements that are either unsupported by the record or fail to reflect the fundamental task of the Commission -- a task that is otherwise recognized in the Recommended Decision -- making rural rates reasonably comparable to urban rates. For example, in paragraphs 43 and 44, the Recommended Decision

concludes that the design parameters for high cost support should be set within certain ranges. For the first part of the distribution formula, the Recommended Decision supports a “national benchmark at a level somewhere between 115 and 150 percent of the national weighted average cost per line.” For the second part of the distribution formula, the Recommended Decision supports a state effort defined by a surcharge of from 3% to 6% of intrastate revenues. Although these are broad ranges, they are without support in the record and might jeopardize reasonably comparable rates. For example, it may turn out, once data is available, that reasonable comparability can be achieved only at a cost benchmark of 110% and a state effort of 2%. In that event, the ranges stated within the Recommended Decision would certainly fail to produce sufficient federal support to comply with the statute. There is no evidence, nor even explanatory speculation, as to why the Joint Board thought that parameters within these ranges of 115-150% and 3-6% could achieve reasonable comparability. Indeed, it would be impossible to produce such evidence since the Recommended Decision recommends that costs, not rates, be used as a yardstick and there is not yet a finalized cost model and model inputs.¹

There are some disturbing statements about there being no need to increase the overall size of the fund. In paragraph 49, the Recommended Decision properly recognizes that some states currently may not be receiving support sufficient to enable reasonably comparable rates, and thus support levels may need to rise somewhat. The Recommended Decision goes on, however, to also state a contrary conclusion: under current circumstances, there is no need for “a high cost support mechanism that results in a significantly larger federal support amount than exists today.” Likewise, Commissioners Johnson and Baker noted they were “pleased that the Recommended Decision anticipates a high cost fund at or near today’s levels.” There is no basis in the record for these statements. Moreover, it is particularly difficult to understand how these statements can be made lacking a finalized cost model. Without cost data, it is logically impossible to determine whether a fund “at or near today’s levels” will meet the statutory criteria.

¹ Commissioners Tristani and Furchgott-Roth correctly noted that it is simply too early to tell whether the ranges suggested in the Recommended Decision can achieve the statutory goal.

Any statement opposing “larger” federal support amounts is particularly difficult to understand in light of the Recommended Decision’s simultaneous decision to support hold-harmless protection. At paragraph 53, the Recommended Decision supports a guarantee that “no non-rural carrier, including the Puerto Rico Telephone Company, will receive less federal high cost assistance than the amount it currently receives from explicit support mechanisms.” This hold harmless protection will cost tens, perhaps hundreds, of millions of dollars.

While we do not oppose this hold-harmless protection, we note that, all other things being equal, hold-harmless substantially increases the size of the federal support amount. If the Commission should provide hold-harmless protection and simultaneously prevent any increase in fund size, the result is very likely to be a federal fund that is insufficient to ensure reasonable comparability.²

Before the Commission can establish the proper size of the federal fund, it must do two things:

- 1) It must adopt a cost model and finalize input values. The Recommended Decision supports using forward- looking costs as a proxy for rates. In evaluating whether rates are “reasonably comparable” therefore, a reliable cost model is essential.
- 2) It must establish a standard for reasonable comparability of rates. This will require establishing a base “urban cost” and comparing it against the net cost for rural carriers. In the end, the costs of high cost carriers, net of support, must be reasonably comparable to that of low-cost carriers.³ This means the ratio of high to low cannot be excessive. Unfortunately, the Recommended Decision did not take a position on how large an absolute difference between low-cost and high-cost carriers meets the statutory standard. The Commission must do so, however, if it is to comply with the Act.

² These same two policies will also ensure that other policies supported in the Recommended Decision, such as the use of forward-looking models to calculate support, will have little or no real world effect.

³ Moreover, if the Commission accepts the recommendation in the Recommended Decision that there be a state effort component in calculating federal support, the amount of that effort must be considered in the “net cost” calculation for high cost carriers when the Commission determines that the reasonably comparable rates standard has been met.

III. STATE EFFORT UNDER THE SECOND PART OF THE DISTRIBUTION PROPOSAL SHOULD BE DEFINED AS A FIXED CONTRIBUTION PER LINE.

In paragraph 44 and 45 of the Recommended Decision the Joint Board defined the “second step” in calculating federal support, to define the state’s share of responsibility for high cost needs. Federal support would only be provided for costs above the level of imputed state responsibility.

Paragraph 44 of the Recommended Decision proposed three methods of defining this imputed state support: 1) ratio of lines above and below a specified cost threshold; 2) a fixed dollar amount per line; and 3) a fixed percentage of intrastate revenue. We support the second of these options, defining each state’s responsibility by a fixed dollar amount per access line. Alternatives 1) and 3) each present difficulties and should be avoided.

The Commission should not use the ratio of high to low cost lines in order to determine an imputed state support amount. This ratio would normally be highly correlated with average study area cost; as such it measures the wrong thing. Average study area cost is an input in the first step of the distribution plan. Using a proxy for the same data in the second step merely confuses the purpose of that second step. The purpose of the second step is not to give further benefits to high cost areas. The purpose is to estimate a reasonable statewide effort. Reasonable statewide effort and need for support are independent concepts, however. The methodology considers need for support in step one. Step two should be based on an estimate of fiscal burden, not another proxy for need. Accordingly, this method will not necessarily further the rate comparability requirements of the Act or reduce the Federal fund size.

The Commission should not use a fixed percentage of intrastate revenue in order to determine an imputed state support amounts. This method would calculate a greater state support in states that have high intrastate revenue. However, under state ratemaking principles, high revenues are permitted only when a carrier has high intrastate costs. Therefore the effect would be contrary to the purpose of the program. It would unduly burden high cost states with larger state efforts

simply because they also have high intrastate revenues. This would defeat the comparability objectives of the Act.

If state responsibility were defined by a fixed contribution per access line per month, it is still possible for the Commission to satisfy the rate comparability requirements of the Act. Of course, any such state effort affects the overall "rates" paid by customers as much as do the charges otherwise paid to their telephone carrier, and the amount of this effort will not be uniform from state to state. Therefore, if the Commission does include a state effort component in calculating federal support, that effort must be included in the "net cost" calculation for high cost carriers when measuring whether reasonably comparable rates have been achieved.

IV. COMPETITION IN THE LOCAL EXCHANGE MARKET CANNOT BE A PRECONDITION TO REPAIRING DEFICIENCIES IN THE EXISTING FEDERAL HIGH COST SUPPORT PROGRAMS.

The separate statement by Commissioner Schoenfelder recommends that the fund size for non-rural LECs remain at the present level until the Joint Board determines that competition has eroded implicit support for universal service. This incorrectly infers that the requirements of Section 254 are predicated on the development of local competition. On the contrary, Section 254 of the Act simply and unconditionally requires a sufficient federal universal service fund to produce comparable rates between urban and rural areas. Even if competition should fail to appear everywhere, Section 254 still requires a larger federal universal service fund because the existing high cost fund program is not sufficient and does not produce reasonably comparable rates.

The existing support system was not designed, as the Act now requires, to ensure that rates in rural, insular and high costs areas are reasonably comparable to rates in urban areas. It should come as no surprise then that it fails to meet the standards later enunciated in the 1996 Act. The existing system is insufficient with regard to loop support, switch support and transport support.

The existing support mechanism for high cost loops is insufficient for companies serving more than 200,000 loops. The existing high cost fund provides support for loop costs (based upon the embedded unseparated cost per loop) above 115 percent of the national average. For small companies with fewer than 200,000 loops, incremental support is 65%. For larger companies, by contrast, the incremental support level is only 10%. The rules thus provide 55 percent less federal support at the margin for local telephone service costs in the areas served by a large company. This discriminates against states with high cost areas served by large companies. The FCC's policy of preferentially supporting small companies prevents ratepayers of large companies with high costs from obtaining reasonably comparable rates.

The existing support mechanism for switching cost is insufficient because it discriminates explicitly against larger companies. The current rules permit small carriers to multiply their switching interstate minutes of use by a fixed factor ranging from 2.0 to 3.0, with the higher multipliers available to the smaller companies. This support mechanism is insufficient because it does not provide any support to larger companies, even when those companies have high switching costs and high rates. The result is a program that is both over-inclusive and under-inclusive. It is under-inclusive because it fails to provide support to companies with high switching costs that have more than 50,000 lines. It is over-inclusive because it provides support to small companies with low switching costs that do not need support in order to keep rates reasonably comparable.

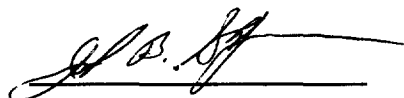
Finally, there is no existing support mechanism for trunking cost even though some trunking is necessary to provide the services supported by universal service. While transport costs are generally smaller than loop and switching costs, this is not always the case. If the Commission's new high cost program is to succeed in keeping rates reasonably comparable, it must take into account at least those trunking costs that are essential to the provision of universal service. Since the incidence of these costs varies and is significant, high cost programs must account for them.

V. IF THE PROXY MODEL IS NOT READY IN TIME, THE COMMISSION SHOULD IMPLEMENT A NEW SYSTEM ON JULY 1, 1999 FOR NONRURAL CARRIERS BASED UPON EXISTING DATA.

High cost states have been waiting a long time for the relief required by the Act. The act passed nearly three years ago. While there has been substantial movement on schools and libraries, and on rural health care, and on lifeline and link-up, there has not been any action to date on high cost support. The Commission has deferred action on this issue several times in order to permit more time to develop proxy cost models and to adopt inputs into those models. While we are encouraged by recent progress with the models, the Commission should not impose further delays while waiting for their perfection.

If the Commission is not prepared to finalize a forward-looking model including input values in sufficient time to calculate and distribute support to non-rural carriers on July 1, 1999, the Commission should establish an interim support program based upon embedded accounting costs. That program should abolish all size-based distinctions, since these distinctions are not competitively neutral and disadvantage customers of larger carriers. That program should also make an effort to measure all costs relevant to providing universal service, including loop, switching and trunking.

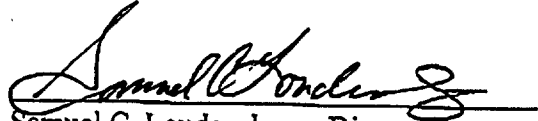
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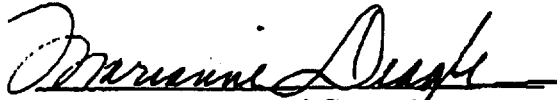
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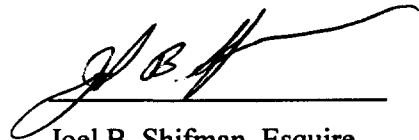
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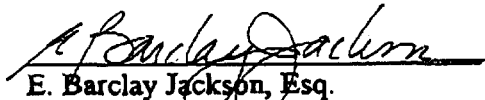
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December 22, 1998

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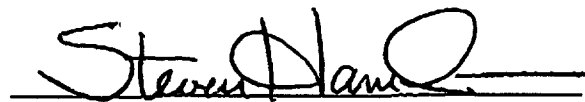
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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In the Matter of

Federal-State Joint Board on
Universal Service

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)
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CC Docket No. 96-45

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing documents
have been furnished to the parties on the attached service list.


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